

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

FIDELITY AND DEPOSIT COMPANY  
OF MARYLAND,

**Plaintiff(s)**

**vs.**

TELMARK, LLC, et al.,

**Defendant(s)**

**Case No.:** JFM 03CV0266

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**MOTION FOR ADMISSION *PRO HAC VICE***

I, JOHN F. DOUGHERTY, am a member in good standing of the bar of this Court. My bar number is 25369. I am moving the admission of

THOMAS D. KELEHER to appear *pro hac vice* in this case as  
Telmark, LLC, Agway Energy Products, LLC, Agway Energy  
counsel for Services, Inc. and Agway Energy Services-PA, Inc.

We certify that:

1. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts:

Court	Date of Admission
<u>New York State</u>	<u>January 1980</u>
<u>U.S. District Court NDNY</u>	<u>January 1980</u>
<u>U.S. District Court WDNY</u>	<u>January 1982</u>
<u>U.S. District Court SDNY</u>	<u>January 2002</u>
<u>6th Circuit Court of Appeals</u>	<u>May 2001</u>
<u>Eastern District of Michigan</u>	<u>November 1999</u>

2. During the twelve months immediately preceding this motion, the proposed admittee has been admitted *pro hac vice* in this Court 0 times.

3. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied

admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts).

4. The proposed admittee is familiar with the Code of Professional Responsibility, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands admission pro hac vice is for this case only and does not constitute formal admission to the bar of this Court.

6. Either the undersigned movant or Andrew Jay Graham, is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.

7. **The \$50.00 fee for admission pro hac vice is enclosed.** (Payment may be made by check or money order payable to: Clerk, United States District Court or by major credit card.)

Respectfully submitted,

MOVANT

/s/  
Signature

John F. Dougherty  
Printed Name

Kramon & Graham, P.A.  
Firm One South Street - Suite 2600  
Baltimore, MD 21202

Address

(410) 752-6030  
Telephone Number

(410) 539-1269  
Fax Number

PROPOSED ADMITTEE

/s/  
(original bearing signature of Thomas D. Keleher  
is being maintained in office of John F. Dougherty)

Thomas D. Keleher  
Printed Name

Bond, Schoeneck & King, PLLC  
Firm One Lincoln Center  
Syracuse, NY 13202-1355

Address

(315) 218-8000  
Telephone Number

(315) 218-8100  
Fax Number

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**ORDER**

☐ GRANTED

☐ DENIED

\_\_\_\_\_  
Date

\_\_\_\_\_  
United States District Judge